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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

USA FOOTBALL, INC.

Plaintiff,

vs.

Civil Action Nos.

4 : 23-cv-00465-ALM and

FFWCT, LLC; USA FLAG, LLC; 4:23-cv-00516-ALM

AND TRAVIS BURNETT,

Defendants.

_____ /

The video-recorded deposition of JAMIE RILEY and USA Football Designee, was held on Thursday, April 4, 2024, commencing at 10:04 a.m., via Zoom Web Conference, before Christine A. Gonzalez, CSR, RPR, a Notary Public.

Stenographically Reported By:

Christine A. Gonzalez, CSR, RPR

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2	April 4, 2024		USA Football.
3			Whereupon,
4			JAMIE RILEY,
5	Exhibit No.	Marked	called as a witness, having been first duly
6	Exhibit(s) Attached		sworn to tell the truth, the whole truth, and nothing
7	Exhibit 549 USA Football Article	182	but the truth, was examined and testified as follows:
8	July 20, 2021		-----
9	Exhibit 550 Email String	190	E X A M I N A T I O N
10	Bates Nos. USAFB371-400		-----
11			11 BY MR. NIELSEN:
12			12 Q All right. Good morning, Ms. Riley.
13	QUESTIONS INSTRUCTED NOT TO ANSWER		13 Thank you for being available today for your
14	Page 193, Line 23		14 deposition, and I will be -- before we get really
15			15 started with questions, let's just make sure we're
16			16 all on the same page with how this goes, especially
17			17 virtually.
18			18 Have you ever had your deposition taken
19			19 before?
20			20 A No.
21			21 Q Okay. So basically, what happens is
22			22 I'm going to ask questions, you'll give me, you
23			23 know, answers to the best of your ability and at
24			24 times your counsel may object to my questions
25			25 and -- do you understand that so far?
1	*****	Page 7	Page 9
2	THE VIDEOGRAPHER: Good morning. We		1 A Correct. Yes.
3	are now on the record at 10:04 a.m. on		2 Q Okay. And at times your counsel may,
4	Thursday, April 4th, 2024.		3 depending on my question, possibly instruct you not
5	This begins the videotaped deposition		4 to answer questions, but typically, unless
6	of Jamie Riley taken in the matter of		5 Ms. Ricchiuto affirmatively instructs you not to
7	USA Football verse FFWCT; USA Flag; Travis		6 answer, you need to answer all of my questions to
8	Burnett; Case No. 4:23-cv-00516-ALM.		7 the best of your ability even if there is an
9	My name is Bailey Wellman, your remote		8 objection.
10	videographer for today. Our court reporter		9 Do you understand that?
11	is Christine Gonzalez. We are both		10 A Yes.
12	representing Fortz Legal Support.		11 Q Okay. And because this is being taken
13	As a courtesy, will everyone who is not		12 down for a transcript, head nods, gestures, it's
14	speaking please mute your audio, remember to		13 normal, you know, kind of part of our speech, but
15	unmute your audio when you are ready to		14 the court reporter can't really take those down, so
16	speak?		15 let's try to do yeses and noes as much as possible.
17	Counsel, will you please state your		16 Okay?
18	name and who you represent, after which our		17 A Yes.
19	court reporter will swear in the witness?		18 Q And one of the things that's really
20	MR. NIELSEN: Mark Nielsen representing		19 important when we do this virtually is that you may
21	FFWCT, et al.		20 have an answer before I'm completely done with my
22	MR. HARRIS: Taylor Harris representing		21 question or I may start asking a question before
23	FFWCT, et al., as well.		22 you're done with an answer, let's do our best not
24	MS. RICCHIUTO: Anne Ricchiuto from		23 to interrupt each other so the court reporter can
25	Peele Law Group for USA Football, and we also		24 get everything down smoothly. Okay?
			25 A Got it.

<p style="text-align: right;">Page 50</p> <p>1 A Our USA Football trademark portfolio.</p> <p>2 BY MR. NIELSEN:</p> <p>3 Q What's in that portfolio?</p> <p>4 MS. RICCHIUTO: Same objection.</p> <p>5 A USA Football, USA -- sorry -- The One</p> <p>6 Flag Championship, Rookie Tackle. We have a</p> <p>7 full -- we have a full list of trademark, so...</p> <p>8 MR. NIELSEN: Okay. Ms. Reporter,</p> <p>9 let's take this down. We are going to come</p> <p>10 back to it, so let's not have it go too far</p> <p>11 away, but let's take down Exhibit 536, which</p> <p>12 was Tab 6, and if you would put up Tab 8, and</p> <p>13 we'll mark that as 537.</p> <p>14 And I'll represent for the record that</p> <p>15 Tab 8 is a portion of Exhibit B, as in boy,</p> <p>16 to the Complaint in the '516 action.</p> <p>17 (Exhibit 537 was marked for purposes of</p> <p>18 identification.)</p> <p>19 BY MR. NIELSEN:</p> <p>20 Q And Ms. Riley, feel free to look</p> <p>21 through this and let me know when you're ready.</p> <p>22 A Yes, I'm ready.</p> <p>23 Q Does this table shown here, in the</p> <p>24 first three pages of Exhibit B to the Complaint in</p> <p>25 the '516 action, give you any further clarity on</p>	<p style="text-align: right;">Page 52</p> <p>1 back up, please. And if Ms. Riley has</p> <p>2 control, if you want to scroll this back up</p> <p>3 to the top of the document, that would be</p> <p>4 great. Perfect.</p> <p>5 BY MR. NIELSEN:</p> <p>6 Q And you recognize this as the Complaint</p> <p>7 filed by USA Football against my clients, correct?</p> <p>8 A Correct.</p> <p>9 Q And I know in the list of topics there</p> <p>10 was a topic that called out specific paragraph</p> <p>11 numbers in this Complaint, so that's what I want to</p> <p>12 do now is kind of work through that.</p> <p>13 Ms. Riley, if you --</p> <p>14 MR. NIELSEN: Oh, go ahead, Anne.</p> <p>15 MS. RICCHIUTO: Sorry, Mark. Can we</p> <p>16 just -- for clarification then, are these</p> <p>17 next series of questions related to the</p> <p>18 Complaint? Are these intended to be 30(b)(6)</p> <p>19 questions?</p> <p>20 MR. NIELSEN: The questions are the</p> <p>21 questions.</p> <p>22 MS. RICCHIUTO: Well --</p> <p>23 MR. NIELSEN: I don't have to tell you</p> <p>24 that. They're in our -- they're in our</p> <p>25 notice and --</p>
<p style="text-align: right;">Page 51</p> <p>1 what "the Marks" may mean in paragraph 17 of the</p> <p>2 Complaint?</p> <p>3 A Yeah. As I said, USA Football</p> <p>4 trademarks.</p> <p>5 Q Okay. And this list here would at</p> <p>6 least be part of that?</p> <p>7 A Correct.</p> <p>8 Q Are there any other trademarks that</p> <p>9 USA Football has that it believes is part of this</p> <p>10 case?</p> <p>11 MS. RICCHIUTO: Object to the extent it</p> <p>12 calls for --</p> <p>13 BY MR. NIELSEN:</p> <p>14 Q Other than what's on this list. Let me</p> <p>15 clarify that.</p> <p>16 A As part of this case, these seem</p> <p>17 appropriate.</p> <p>18 Q So going back to the question of</p> <p>19 paragraph 17: What is the definition of "the</p> <p>20 Marks," this Exhibit B table here would be the</p> <p>21 definition in your mind; is that fair?</p> <p>22 A That is fair.</p> <p>23 MR. NIELSEN: Okay. Ms. Reporter, you</p> <p>24 can take this down, please.</p> <p>25 And let's put up Tab 6, Exhibit 536</p>	<p style="text-align: right;">Page 53</p> <p>1 MS. RICCHIUTO: There are things that</p> <p>2 are in your notice, you can ask her on behalf</p> <p>3 of the company, and things like where did she</p> <p>4 go to college and what classes did she take,</p> <p>5 I haven't been lodging this objection on</p> <p>6 every question 'cause I'm actually not trying</p> <p>7 to get in the way of your deposition, but I</p> <p>8 do think that it's important that the record</p> <p>9 is clear.</p> <p>10 And so since you've -- the other way to</p> <p>11 do it, Mark, is every single question, you've</p> <p>12 got to say who you're -- in what capacity</p> <p>13 you're asking.</p> <p>14 MR. NIELSEN: I've never seen that</p> <p>15 done, Anne. Never seen --</p> <p>16 MS. RICCHIUTO: Well, right, because --</p> <p>17 because most of the time people make some</p> <p>18 logical assumptions --</p> <p>19 MR. NIELSEN: All right. Let's move</p> <p>20 on.</p> <p>21 MS. RICCHIUTO: -- but I want to be</p> <p>22 clear.</p> <p>23 MR. NIELSEN: Let's move on. If I</p> <p>24 mention --</p> <p>25 MS. RICCHIUTO: -- lodge objection --</p>

<p>1 (Overlapping speakers.) 2 STENOGRAPHIC REPORTER: Wait, wait, 3 wait. It's cutting both of you off. So I 4 heard let's move on. I heard, I think, an 5 objection or something. 6 MS. RICCHIUTO: I just said then I'll 7 lodge objections as appropriate going 8 forward. I thought I was going to make it 9 easier, but... 10 MR. NIELSEN: We'll talk about it off 11 the record at a break. 12 BY MR. NIELSEN: 13 Q Ms. Riley, can you scroll down to 14 paragraph 11, please? And please feel free to read 15 paragraph 11 to yourself and let me know when 16 you're ready. 17 A I'm ready. 18 Q When it says "USA Football operates 19 events across all disciplines of football... -- 20 I'm not going to read the rest of it -- what is 21 meant there by the word "operates"? 22 A We run and facilitate events. 23 Q And is there a difference between 24 running an event and facilitating an event? 25 A No.</p>	<p>Page 54</p> <p>1 American Football. But as far as USA Football 2 specifically, almost every year depending upon the 3 discipline of the sport. 4 Q I should've asked it a little more 5 clearly. 6 To the best of your knowledge, how far 7 back does that go in terms of USA Football 8 operating those events? 9 A For adults? 10 Q Yes. 11 A Probably all the way back to 2005 or '06 12 relative, again, to the discipline of the sport. 13 Q And if you would be so kind to scroll 14 down to paragraph 19, which is also a topic in our 15 30(b)(6) notice, and go ahead and read that to 16 yourself and let me know when you're ready. 17 A I'm ready. 18 Q Did USA Football as an entity notify 19 Mr. Burnett at the time in 2017 that it considered 20 Mr. Burnett's intended use of the name and mark 21 USA Flag to be an infringement? 22 A Yes. 23 Q So the company itself did? 24 A Our CEO. Our CEO told Mr. Burnett. 25 Q And it says "at that time." Was that</p>
<p>Page 55</p> <p>1 Q And does USA Football operate events in 2 connection with adult flag football? 3 A Yes. 4 Q And those are the events you mentioned 5 earlier. It was The One Championship, and this 6 year there's some qualifying events; is that 7 correct? 8 A Those are qualifying tournaments. We 9 also operate trials and training camps for adults 10 and competitions. 11 Q What competitions does USA Football 12 operate for adults besides The One Flag 13 Championship? 14 A Sure. We have operated events on 15 behalf of International Federation of American 16 Football for international competition with adults. 17 Q And when you say "operated," that's 18 USA Football operated it? It wasn't contracted out 19 to a third party? 20 A Correct. 21 Q How long has that -- has USA Football 22 been operating those adult events that you just 23 mentioned? 24 A Well, it varies on when the events are 25 happening through the International Federation of</p>	<p>Page 57</p> <p>1 in 2017? 2 A I believe so, yes. 3 Q And any particular point in time during 4 2017 when this happened? 5 A It was during a meeting at our 6 USA Football offices. 7 Q Was that in July of 2017? 8 A I don't recall the actual month, but I 9 believe we started engaging with Mr. Burnett in 10 July of 2017 in a conversation. 11 Q And that took place at USA Football's 12 offices in Indianapolis? 13 A Yes. 14 Q Did you witness that? 15 A I don't believe I was in the room. 16 Q Then how do you know that that took 17 place? 18 MS. RICCHIUTO: Objection, 19 argumentative. This is a topic on which she 20 was to be prepared to testify, and she's 21 prepared to testify about this topic. 22 BY MR. NIELSEN: 23 Q Ms. Riley? 24 A How was I made aware; is that the 25 question?</p>

<p>1 MR. NIELSEN: Ms. Videographer, if you 2 could put up Tab 24, and we'll mark that as 3 Exhibit 549.</p> <p>4 And I will represent that this is 5 Exhibit 26 to the Complaint in the '465 6 action. And I will also represent that this 7 the red underlines were added by us. They 8 weren't in the original that you'all put up. 9 (Exhibit 549 was marked for purposes of 10 identification.)</p> <p>11 BY MR. NIELSEN: 12 Q And feel free to take a look at this, 13 Ms. Riley.</p> <p>14 A Sure. Okay.</p> <p>15 Q Does this -- strike that. 16 Does this appear to be a press release 17 by USA Football on the USAFootball.com website?</p> <p>18 A It appears to be. Yes.</p> <p>19 Q Have you seen this press release before 20 today?</p> <p>21 A It's possible.</p> <p>22 Q Would you agree that this press release 23 was dated July 20, 2021?</p> <p>24 A Yes.</p> <p>25 Q And in perusing it, would you agree</p>	<p>Page 182</p> <p>1 directly, no.</p> <p>2 Q Can you repeat that answer? I honestly 3 didn't --</p> <p>4 A Not to my understanding. Sorry. I 5 feel like I'm speaking loud. I may not speaking 6 loud enough.</p> <p>7 No, not to my understanding and 8 definitely not to me directly.</p> <p>9 MR. NIELSEN: All right.</p> <p>10 Ms. Videographer, you can take this down, 11 please.</p> <p>12 BY MR. NIELSEN: 13 Q Does USA Football believe that being 14 the national governing body for flag football in 15 the United States under the Ted Stevens Olympic and 16 Amateur Sports Act is a right that USA Football 17 possesses?</p> <p>18 A No. We are the governing body for the 19 sport of football, all disciplines. And under the 20 umbrella of being a member -- sole member of IFAF, 21 we do have that right.</p> <p>22 As it relates to the USOPC and being 23 certified as a national governing body, as I stated 24 before, that can be an open application to anyone 25 who would like to apply for that.</p>
<p>1 that its context is flag football?</p> <p>2 A I'm sorry. What do you mean by 3 "context is flag football"?</p> <p>4 Q Well, it's about a flag football event 5 or situation, correct? It's not about tackle 6 football or something else?</p> <p>7 A This particular press release seems to 8 be about announcing our high performance and 9 athletes and coach advisory committees on behalf -- 10 on behalf of flag football. Correct.</p> <p>11 Q And do you have any understanding in 12 terms of whether this press release was issued 13 after the USOPC asked USA Football not to use 14 "national" in front of governing body?</p> <p>15 A My understanding is they did not tell 16 us that until October of 2023. Up until that 17 point, they have referenced us as a national 18 governing body both in agreements and in emails, as 19 I stated before.</p> <p>20 Q So before October of 2023, the 21 US Olympic and Paralympic Committee had not asked 22 USA Football not to use "national" in front of 23 governing body in media press releases and things 24 of that nature?</p> <p>25 A Not to my nature [sic]. Not to me</p>	<p>Page 183</p> <p>1 that its context is flag football?</p> <p>2 A I'm sorry. What do you mean by 3 "context is flag football"?</p> <p>4 Q Well, it's about a flag football event 5 or situation, correct? It's not about tackle 6 football or something else?</p> <p>7 A This particular press release seems to 8 be about announcing our high performance and 9 athletes and coach advisory committees on behalf -- 10 on behalf of flag football. Correct.</p> <p>11 Q And do you have any understanding in 12 terms of whether this press release was issued 13 after the USOPC asked USA Football not to use 14 "national" in front of governing body?</p> <p>15 A My understanding is they did not tell 16 us that until October of 2023. Up until that 17 point, they have referenced us as a national 18 governing body both in agreements and in emails, as 19 I stated before.</p> <p>20 Q So before October of 2023, the 21 US Olympic and Paralympic Committee had not asked 22 USA Football not to use "national" in front of 23 governing body in media press releases and things 24 of that nature?</p> <p>25 A Not to my nature [sic]. Not to me</p>

<p>1 A Sure.</p> <p>2 Q Do you know to whom at the NFL</p> <p>3 USA Football has indicated that they were the</p> <p>4 national governing body for football, including</p> <p>5 flag football?</p> <p>6 A Could've been in -- with the</p> <p>7 NFL Foundation, with other departments as it</p> <p>8 relates to conversations and/or discussions around</p> <p>9 the sport.</p> <p>10 Q Any particular people at the NFL or</p> <p>11 NFL Foundation, as you said?</p> <p>12 A We often present to the NFL Foundation</p> <p>13 board and/or the executive director and her staff.</p> <p>14 Q And you mean the executive director of</p> <p>15 the NFL Foundation, correct?</p> <p>16 A Correct.</p> <p>17 Q And what's her name?</p> <p>18 A Alexia Gallagher.</p> <p>19 Q Do you know who is -- well, strike</p> <p>20 that.</p> <p>21 So is it your understanding then that</p> <p>22 USA Football has said in one way or the other to</p> <p>23 the NFL Foundation board that USA Football's the</p> <p>24 national governing body for football and flag</p> <p>25 football in the United States?</p>	<p>Page 186</p> <p>1 Roman, R-O-M-A-N, Oben, O-B-E-N, that it is the</p> <p>2 national governing body for football in the</p> <p>3 United States?</p> <p>4 A Yes. The NFL has been well-aware of</p> <p>5 who we are for quite some time.</p> <p>6 Q And when you say "for quite some time,"</p> <p>7 how far back are you thinking?</p> <p>8 A Well, the NFL was instrumental in</p> <p>9 creating USA Football when we were created back in</p> <p>10 2002.</p> <p>11 Q And in terms of NFL knowing that</p> <p>12 USA Football is the national governing body for</p> <p>13 football in the United States, how far back do you</p> <p>14 believe that goes?</p> <p>15 A Since the first time we mentioned it.</p> <p>16 Q Do you know when that was?</p> <p>17 A I don't know specifically. I was not</p> <p>18 employed by USA Football prior to 2014.</p> <p>19 Q By the time you arrived at</p> <p>20 USA Football, had USA Football already been</p> <p>21 communicating to the NFL that it was the national</p> <p>22 governing body for football in the United States?</p> <p>23 A Yes.</p> <p>24 Q Do you know who Izell Reese is?</p> <p>25 A Yes.</p>
<p>1 A Yes, for football as a sport, not just</p> <p>2 flag football.</p> <p>3 Q But it would include flag football,</p> <p>4 correct?</p> <p>5 A Any discipline of the sport, correct.</p> <p>6 Q Do you know who is on the NFL</p> <p>7 Foundation board right now?</p> <p>8 A There -- the NFL Foundation board is</p> <p>9 made up of different NFL team club owners.</p> <p>10 Q Is it limited to team club owners?</p> <p>11 A I'm not positive on that. You'd have</p> <p>12 to ask them, but my experience has been with club</p> <p>13 owners.</p> <p>14 Q Has USA Football told Troy Vincent that</p> <p>15 you'all are the national governing body for</p> <p>16 football in the US?</p> <p>17 A I'm sure that has been bought up in</p> <p>18 different conversations or meetings. Yes.</p> <p>19 Q Has USA Football mentioned that it is</p> <p>20 the national governing body for football in the</p> <p>21 United States to Kimberly Fields?</p> <p>22 A Not that I'm aware of unless she was</p> <p>23 part of a meeting that it was mentioned, but I</p> <p>24 can't be specific if she was there.</p> <p>25 Q Has USA Football mentioned to</p>	<p>Page 187</p> <p>1 Q Does Izell Reese know that USA Football</p> <p>2 is the national governing body for football in the</p> <p>3 United States?</p> <p>4 A I can assume so.</p> <p>5 Q And what do you base that assumption</p> <p>6 on?</p> <p>7 A Because we had to work with his company</p> <p>8 during the transition of NFL FLAG.</p> <p>9 Q And is his company RCX Sports?</p> <p>10 A I believe so. I believe they go by</p> <p>11 RC Sports now, but they've changed their name a few</p> <p>12 times.</p> <p>13 MR. NIELSEN: Yeah. Okay. For the</p> <p>14 reporter that's R-C-X, like the letters.</p> <p>15 BY MR. NIELSEN:</p> <p>16 Q And would Mr. Reese's knowledge of</p> <p>17 USA Football being the national governing body go</p> <p>18 back to, let's say, 2020?</p> <p>19 A It could 'cause that's when, I believe,</p> <p>20 the transition was taking place.</p> <p>21 Q Now, staying on the topic of national</p> <p>22 governing body and national governing body</p> <p>23 certification, Topic 26 in the notice, application</p> <p>24 papers for NGB certification have not -- the time</p> <p>25 has not come for them to be submitted yet, correct?</p>

<p>1 Q And the flag football -- I think you've 2 already testified to this, but flag football was 3 added to the Olympic program when? 4 A For LA 2028. 5 Q And when was that decision made or 6 announced by USOPC? 7 A Last fall. 8 Q So do I understand correctly then that 9 prior to that time there was no flag football as an 10 Olympic sport? 11 A Correct. 12 Q Is there any possibility in your mind 13 that the NFL was unaware at any time whether or 14 not -- or, let's say, in 2022, for example, whether 15 or not flag football was an Olympic sport? 16 MR. NIELSEN: Objection to form and 17 leading. 18 A No. You can look it up online as to 19 what Olympic sports there are and aren't. 20 BY MS. RICCHIUTO: 21 Q Has anyone at the NFL ever expressed 22 confusion or lack of clarity to USA Football about 23 whether or not flag football was an Olympic sport 24 in 2022? 25 MR. NIELSEN: Same objections.</p>	<p>Page 206 1 And what's today? Today's the 4th. 2 Can we get this by the 10th? 3 STENOGRAPHIC REPORTER: Sure. 4 MR. NIELSEN: Great. 5 MS. RICCHIUTO: And we will take an 6 Etrans. And we don't need -- I feel like I 7 didn't say correctly the last time, Bailey. 8 What we want is, like, we want to be able to 9 get video if we need video, but I don't need 10 the video, like, all synced up and 11 whiz-banged now. 12 Does that make sense? 13 THE VIDEOGRAPHER: Yes. 14 STENOGRAPHIC REPORTER: Do you also 15 want it expedited for the 10th? 16 MS. RICCHIUTO: No, I don't think so. 17 (Deposition concluded at 4:57 p.m.) 18 19 20 21 22 23 24 25</p>
<p>1 A No. 2 MS. RICCHIUTO: That's all my 3 questions. 4 MR. NIELSEN: Okay. Good. So subject 5 to any discussions between counsel as to any 6 of the topics, I think we're good as far as 7 being done. 8 Anne, what was our agreement on the 9 last -- I think we're going to rush the 10 transcript, but if the transcript -- if 11 changes aren't provided with a signature 12 within 30 days, we'll deem it as signed with 13 no changes. 14 MS. RICCHIUTO: That's fine. And we 15 will want to read and sign. 16 MR. NIELSEN: Yeah. 17 THE VIDEOGRAPHER: This concludes 18 today's deposition. The time is 4:55 p.m. 19 We are off the record. 20 STENOGRAPHIC REPORTER: Okay. So can I 21 have everyone state your order on the record 22 if you're ordering the transcript, please? 23 MR. NIELSEN: Yes. We are ordering the 24 transcript. We do not need video at this 25 time, and we need that transcript rushed.</p>	<p>Page 207 Page 209 1 CERTIFICATE OF DEPONENT 2 3 I hereby certify that I have read and 4 examined the foregoing transcript, and the same is 5 a true and accurate record of the testimony given 6 by me. 7 Any additions or corrections that I 8 feel are necessary will be made on the Errata 9 Sheet. 10 11 12 13 14 JAMIE RILEY 15 16 17 DATE 18 19 (If needed, make additional copies of the Errata 20 Sheet on the next page or use a blank piece of 21 paper.) 22 23 24 25</p>

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1 ERRATA SHEET

2 Case: USA Football vs FFWCT; USA Flag, et al.

3 Witness: JAMIE RILEY

Date: 4/4/2024

4

5 PAGE/LINE SHOULD READ REASON FOR CHANGE

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1 State of Michigan

2 Washtenaw County to wit:

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4 I, Christine A. Gonzalez, CSR, RPR, a
5 Notary Public of the State of Michigan, Washtenaw
6 County, do hereby certify that prior to the
7 commencement of the examination, the within-named
8 witness appeared via Zoom and was duly remotely
9 sworn by me to testify to the truth, the whole and
10 nothing but the truth.

11 I further certify that the examination
12 was recorded stenographically by me, and this
13 transcript is a record of the proceedings to the
14 best of my ability.

15 I further certify that I am not of
16 counsel to any of the parties, nor in any way
17 interested in the outcome of this action.

18 As witness my hand and notarial seal
19 this 10th of April, 2024.

20 Christine Gonzalez

21 Christine A. Gonzalez, CSR, RPR

22 Notary Public - Washtenaw County

23

24 My Commission Expires: June 17, 2028